

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Valery Loumber (CA SBN 209967) Ognian Gavrilov (CA SBN 258583) GAVRILOV & BROOKS 2315 Capitol Avenue Sacramento, CA 95816 Telephone: (916)504-0529 Fax: (916)727-6877 vloumber@gavrilovlaw.com ognian@gavrilovlaw.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: PING LIU AND GUIFEN HE	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: THE ORIGINAL MOWBRAY'S TREE SERVICE, INC. Debtor(s).	CASE NO.: 24-12674-TA-11 CHAPTER: 11
	NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NONBANKRUPTCY FORUM)
	DATE: 02/11/2025 TIME: 10:30 am COURTROOM: 5B
Movant: PING LIU AND GUIFEN HE	

1. **Hearing Location:**

- | | |
|--|---|
| <input type="checkbox"/> 255 East Temple Street, Los Angeles, CA 90012 | <input checked="" type="checkbox"/> 411 West Fourth Street, Santa Ana, CA 92701 |
| <input type="checkbox"/> 21041 Burbank Boulevard, Woodland Hills, CA 91367 | <input type="checkbox"/> 1415 State Street, Santa Barbara, CA 93101 |
| <input type="checkbox"/> 3420 Twelfth Street, Riverside, CA 92501 | |

2. Notice is given to the Debtor and trustee (*if any*)(Responding Parties), their attorneys (*if any*), and other interested parties that on the date and time and in the courtroom stated above, Movant will request that this court enter an order granting relief from the automatic stay as to Debtor and Debtor's bankruptcy estate on the grounds set forth in the attached Motion.
3. To file a response to the motion, you may obtain an approved court form at www.cacb.uscourts.gov/forms for use in preparing your response (optional LBR form F 4001-1.RFS.RESPONSE), or you may prepare your response using the format required by LBR 9004-1 and the Court Manual.

4. When serving a response to the motion, serve a copy of it upon the Movant's attorney (or upon Movant, if the motion was filed by an unrepresented individual) at the address set forth above.
5. If you fail to timely file and serve a written response to the motion, or fail to appear at the hearing, the court may deem such failure as consent to granting of the motion.
6. ☒ This motion is being heard on REGULAR NOTICE pursuant to LBR 9013-1(d). If you wish to oppose this motion, you must file and serve a written response to this motion no later than 14 days before the hearing and appear at the hearing.
7. ☐ This motion is being heard on SHORTENED NOTICE pursuant to LBR 9075-1(b). If you wish to oppose this motion, you must file and serve a response no later than *(date)* _____ and *(time)* _____; and, you may appear at the hearing.
- a. ☐ An application for order setting hearing on shortened notice was not required (according to the calendaring procedures of the assigned judge).
- b. ☐ An application for order setting hearing on shortened notice was filed and was granted by the court and such motion and order have been or are being served upon the Debtor and upon the trustee (if any).
- c. ☐ An application for order setting hearing on shortened notice was filed and remains pending. After the court rules on that application, you will be served with another notice or an order that specifies the date, time and place of the hearing on the attached motion and the deadline for filing and serving a written opposition to the motion.

Date: 01/20/2025

GAVRILOV & BROOKS

Printed name of law firm (if applicable)

Valery Loumber

Printed name of individual Movant or attorney for Movant

/s/ Valery Loumber

Signature of individual Movant or attorney for Movant

MOTION FOR RELIEF FROM THE AUTOMATIC STAY AS TO NONBANKRUPTCY ACTION

1. **In the Nonbankruptcy Action, Movant is:**

- a. ☒ Plaintiff
- b. ☐ Defendant
- c. ☐ Other (*specify*):

2. **The Nonbankruptcy Action:** There is a pending lawsuit or administrative proceeding (Nonbankruptcy Action) involving the Debtor or the Debtor's bankruptcy estate:

- a. *Name of Nonbankruptcy Action:* Ping Liu and Guifen He v. The Original Mowbray's Tree Ser. et al.
- b. *Docket number:* S-CV-0049514
- c. *Nonbankruptcy forum where Nonbankruptcy Action is pending:*
Placer County Superior Court
- d. *Causes of action or claims for relief (Claims):*
Negligence, Negligence Vicarious Liability, Negligence Motor Vehicle

3. **Bankruptcy Case History:**

- a. ☒ A voluntary ☐ An involuntary petition under chapter ☐ 7 ☒ 11 ☐ 12 ☐ 13
was filed on (*date*) 10/18/2024.
- b. ☐ An order to convert this case to chapter ☐ 7 ☐ 11 ☐ 12 ☐ 13
was entered on (*date*) _____.
- c. ☐ A plan was confirmed on (*date*) _____.

4. **Grounds for Relief from Stay:** Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay to proceed with the Nonbankruptcy Action to final judgment in the nonbankruptcy forum for the following reasons:

- a. ☐ Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate.
- b. ☒ Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. ☒ Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- d. ☐ The Claims are nondischargeable in nature and can be most expeditiously resolved in the nonbankruptcy forum.
- e. ☒ The Claims arise under nonbankruptcy law and can be most expeditiously resolved in the nonbankruptcy forum.

- f. ☐ The bankruptcy case was filed in bad faith.
- (1) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (2) ☐ The timing of the filing of the bankruptcy petition indicates that it was intended to delay or interfere with the Nonbankruptcy Action.
- (3) ☐ Multiple bankruptcy cases affect the Nonbankruptcy Action.
- (4) ☐ The Debtor filed only a few case commencement documents. No schedules or statement of financial affairs (or chapter 13 plan, if appropriate) has been filed.
- g. ☐ Other (*specify*):

5. **Grounds for Annulment of Stay.** Movant took postpetition actions against the Debtor.

- a. ☐ The actions were taken before Movant knew that the bankruptcy case had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.
- b. ☐ Although Movant knew the bankruptcy case was filed, Movant previously obtained relief from stay to proceed in the Nonbankruptcy Action in prior bankruptcy cases affecting the Nonbankruptcy Action as set forth in Exhibit. ____.
- c. ☐ Other (*specify*):

6. **Evidence in Support of Motion: (*Important Note: declaration(s) in support of the Motion MUST be signed under penalty of perjury and attached to this motion.*)**

- a. ☒ The DECLARATION RE ACTION IN NONBANKRUPTCY FORUM on page 6.
- b. ☒ Supplemental declaration(s).
- c. ☒ The statements made by Debtor under penalty of perjury concerning Movant's claims as set forth in Debtor's case commencement documents. Authenticated copies of the relevant portions of the Debtor's case commencement documents are attached as Exhibit. 1.
- d. ☐ Other evidence (*specify*):

7. ☒ **An optional Memorandum of Points and Authorities is attached to this Motion.**

Movant requests the following relief:

1. Relief from the stay pursuant to 11 U.S.C. § 362(d)(1).
2. ☒ Movant may proceed under applicable nonbankruptcy law to enforce its remedies to proceed to final judgment in the nonbankruptcy forum, provided that the stay remains in effect with respect to enforcement of any judgment against the Debtor or property of the Debtor's bankruptcy estate.
3. ☐ The stay is annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant in the Nonbankruptcy Action shall not constitute a violation of the stay.

4. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified, or annulled as to the co-debtor, on the same terms and condition as to the Debtor.
5. ☒ The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
6. ☐ The order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the Nonbankruptcy Action.
7. ☐ The order is binding and effective in any future bankruptcy case, no matter who the debtor may be, without further notice
8. ☐ Other relief requested.

Date: 01/20/2025

Gavrilov & Brooks

Printed name of law firm (*if applicable*)

Valery Loumber

Printed name of individual Movant or attorney for Movant

/s/ Valery Loumber

Signature of individual Movant or attorney for Movant

DECLARATION RE ACTION IN NONBANKRUPTCY FORUM

I, (*name of Declarant*) Ognian Gavrilov, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto. I am over 18 years of age. I have knowledge regarding (Nonbankruptcy Action) because:
 - ☐ I am the Movant.
 - ☒ I am Movant's attorney of record in the Nonbankruptcy Action.
 - ☐ I am employed by Movant as (*title and capacity*):
 - ☐ Other (*specify*):
2. I am one of the custodians of the books, records and files of Movant as to those books, records and files that pertain to the Nonbankruptcy Action. I have personally worked on books, records and files, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Movant on behalf of Movant, which were made at or about the time of the events recorded, and which are maintained in the ordinary course of Movant's business at or near the time of the acts, conditions or events to which they relate. Any such document was prepared in the ordinary course of business of Movant by a person who had personal knowledge of the event being recorded and had or has a business duty to record accurately such event. The business records are available for inspection and copies can be submitted to the court if required.
3. In the Nonbankruptcy Action, Movant is:
 - ☒ Plaintiff
 - ☐ Defendant
 - ☐ Other (*specify*):
4. The Nonbankruptcy Action is pending as:
 - a. *Name of Nonbankruptcy Action*: Ping Liu and Guifen He v. The Original Mowbray's Tree Ser et al.
 - b. *Docket number*: S-CV-0049514
 - c. *Nonbankruptcy court or agency where Nonbankruptcy Action is pending*:
Placer County Superior Court
5. **Procedural Status of Nonbankruptcy Action:**
 - a. The Claims are:
Negligence, Negligence Vicarious Liability, Negligence Motor Vehicle
 - b. True and correct copies of the documents filed in the Nonbankruptcy Action are attached as Exhibit 2.
 - c. The Nonbankruptcy Action was filed on (*date*) 11/29/2022.
 - d. Trial or hearing began/is scheduled to begin on (*date*) 08/18/2025.
 - e. The trial or hearing is estimated to require 7 days (*specify*).
 - f. Other plaintiffs in the Nonbankruptcy Action are (*specify*):
None

g. Other defendants in the Nonbankruptcy Action are (*specify*):

JACKSON RAY BERRY

6. **Grounds for relief from stay:**

- a. ☒ Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- b. ☒ Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. ☐ Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate. The insurance carrier and policy number are (*specify*):
- d. ☒ The Nonbankruptcy Action can be tried more expeditiously in the nonbankruptcy forum.
- (1) ☒ It is currently set for trial on (*date*) _____.
- (2) ☒ It is in advanced stages of discovery and Movant believes that it will be set for trial by (*date*) _____. The basis for this belief is (*specify*):
- (3) ☒ The Nonbankruptcy Action involves non-debtor parties and a single trial in the nonbankruptcy forum is the most efficient use of judicial resources.
- e. ☐ The bankruptcy case was filed in bad faith specifically to delay or interfere with the prosecution of the Nonbankruptcy Action.
- (1) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (2) ☐ The timing of the filing of the bankruptcy petition indicates it was intended to delay or interfere with the Nonbankruptcy Action based upon the following facts (*specify*):
- (3) ☐ Multiple bankruptcy cases affecting the Property include:
- (A) Case name: _____
- Case number: _____ Chapter: _____
- Date filed: _____ Date discharged: _____ Date dismissed: _____
- Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted.

(B) Case name:
Case number: Chapter:
Date filed: Date discharged: Date dismissed:
Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted.

(C) Case name:
Case number: Chapter:
Date filed: Date discharged: Date dismissed:
Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted.

☐ See attached continuation page for information about other bankruptcy cases affecting the Nonbankruptcy Action.

☐ See attached continuation page for additional facts establishing that this case was filed in bad faith.

f. ☐ See attached continuation page for other facts justifying relief from stay.

7. ☐ Actions taken in the Nonbankruptcy Action after the bankruptcy petition was filed are specified in the attached supplemental declaration(s).

a. ☐ These actions were taken before Movant knew the bankruptcy petition had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.

b. ☐ Movant knew the bankruptcy case had been filed, but Movant previously obtained relief from stay to proceed with the Nonbankruptcy Action enforcement actions in prior bankruptcy cases affecting the Property as set forth in Exhibit _____

c. ☐ For other facts justifying annulment, see attached continuation page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

01/20/2025
Date

Ognian Gavrilov
Printed name

/s/ Ognian Gavrilov
Signature

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Gavrilov & Brooks 2315 Capitol Ave. Sacramento, CA 95816

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NONBANKRUPTCY FORUM)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 01/21/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

SEE ATTACHED NEF SERVICE LIST

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 01/21/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

SEE ATTACHED SERVICE LIST (including requests for notice)

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>01/21/2025</u>	<u>Samantha Livian</u>	<u>/s/ Samantha Livian</u>
Date	Printed Name	Signature

POS ATTACHMENTS

NEF SERVICE LIST

Ally Bank c/o AIS Portfolio Services, LLC

4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118
(888)455-6662

Added: 10/22/2024

(Creditor)

represented
by

Amitkumar Sharma

AIS Portfolio Services, LLC
4515 N Santa Fe Ave.
Dept. Aps

Oklahoma City, OK 73118

888-455-6662

817-461-8070 (fax)

amit.sharma@aisinfo.com

Assigned: 10/22/24

Altec Capital c/o Glass & Goldberg

mgoldberg@glassgoldberg.com

Added: 11/11/2024

(Creditor)

represented
by

Marshall F Goldberg

Glass & Goldberg

22917 Burbank Blvd.

Woodland Hills, CA 91367-4203

818-888-2220

818-888-2229 (fax)

mgoldberg@glassgoldberg.com

Assigned: 11/11/24

AmTrust North America, Inc. on behalf of Southern Insurance Company

c/o Maurice Wutscher LLP

23611 Chagrin Blvd. Suite 207

Beachwood, OH 44122

Added: 10/25/2024

(Creditor)

represented
by

Alan Craig Hochheiser

Maurice Wutscher LLP

23611 Chagrin Blvd

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Beachwood, OH 44122

216-220-1129

866-581-9302 (fax)

ahochheiser@mauricewutscher.com

Assigned: 10/25/24

Bank of America, N.A.

Added: 01/03/2025

(Creditor)

represented
by

Sharon Z. Weiss

Bryan Cave Leighton Paisner LLP

120 Broadway, Suite 300

Courtesy NEF

Added: 10/21/2024

(Interested Party)

represented
by

Santa Monica, CA 90401-2386
310-576-2100
310-576-2200 (fax)
sharon.weiss@bclplaw.com
Assigned: 01/03/25

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714-520-0680 (fax)
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Assigned: 10/22/24

Raffi Khatchadourian

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Encino, CA 91436
818-907-3107
818-501-2985 (fax)
raffi@hemar-rousso.com
Assigned: 12/12/24

Thomas E Shuck

Parker, Milliken, Clark, O'Hara &
Samuelian
515 S. Flower Street
Ste 8th Floor
Los Angeles, CA 90071
213-683-6500
213-683-6669 (fax)
tshuck@pmcos.com
Assigned: 01/14/25

Roye Zur

Elkins Kalt Weintraub Reuben Gartside LLP
10345 W. Olympic Blvd.
Los Angeles, CA 90064
310-746-4400
rzur@elkinskalt.com
Assigned: 10/21/24

Force Ten Partners LLC

5271 California Ste 270

Irvine, CA 92617

*Added: 11/25/2024**(Financial Advisor)***Ford Motor Credit Company, LLC, c/o AIS Portfolio Services, LLC**

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118

(817)277-2011

*Added: 10/24/2024**(Creditor)*represented
by**Amitkumar Sharma**

AIS Portfolio Services, LLC

4515 N Santa Fe Ave.

Dept.Aps

Oklahoma City, OK 73118

888-455-6662

817-461-8070 (fax)

amit.sharma@aisinfo.com

*Assigned: 10/24/24***Ana Lidia Gomez**

c/o BLC Law Center, APC

1230 Columbia St. Suite 1100

San Diego, CA 92101

United States

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by**Ahren A Tiller**

Bankruptcy Law Center

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619-894-8831

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ahren.tiller@blc-sd.com

*Assigned: 11/26/24***Grobstein Teeple LLP**

Grobstein Teeple LLP

23832 Rockfield Blvd Ste 245

Lake Forest, CA 92630

9493815655

9493815665 (fax)

jteeples@gtllp.com

*Added: 11/15/2024**(Financial Advisor)***Hilco Valuation Services LLC**

Attn: Eric Kaup, EVP, CCO

5 Revere Dr, Ste 300

Northbrook, IL 60062

847-868-9681

Added: 12/19/2024
(Other Professional)

**John Deere Construction & Forestry Company, c/o The Dunning Law Firm,
APC**

9619 Chesapeake Drive, Suite 210
San Diego, CA 92123
858-974-7600
858-974-7601 (fax)
jmacleod@dunninglaw.com

Added: 12/11/2024
(Creditor)

Ronnie Jordan

Added: 10/22/2024
(Interested Party)

Pamela Metcalf-Kunellis

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1520 Eureka Rd.
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Added: 12/06/2024
(Creditor)

Raines Feldman Littrell LLP

3200 Park Center Dr Ste 250
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(Attorney)

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Added: 11/26/2024
(Creditor)

Southern California Edison

c/o Russell R. Johnson III
2258 Wheatlands Drive
Manakin-Sabot, VA 23103
russj4478@aol.com
Added: 11/04/2024
(Creditor)

The Original Mowbray's Tree Service, Inc.

Brian Weiss, CRO
c/o Force Ten Partners, LLC
5271 California Ave. Suite 270
Irvine, CA 92617
Tax ID / EIN: 71-0873041
Added: 10/18/2024
(Debtor)

United States Trustee (SA)

411 W Fourth St., Suite 7160
Santa Ana, CA 92701-4593
(714) 338-3400
(714) 338-3421 (fax)

represented
by

represented
by

represented
by

represented
by

Ahren A Tiller

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Assigned: 11/26/24

David W. Meadows

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310-557-8493 (fax)
david@davidwmeadowslaw.com
Assigned: 11/04/24

Robert S Marticello

Raines Feldman Littrell LLP
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Michael Simon

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310-620-9243
msimon@raineslaw.com
Assigned: 10/21/24

Queenie K Ng

411 West Fourth St.
Suite 7160
Santa Ana, CA 92701
714-338-3403

ustpreion16.sa.ecf@usdoj.gov

Added: 10/18/2024

(U.S. Trustee)

714-338-3421 (fax)

queenie.k.ng@usdoj.gov

Assigned: 12/20/24

LEAD ATTORNEY

Nancy S Goldenberg

411 W Fourth St Ste 7160

Santa Ana, CA 92701-8000

714-338-3416

714-338-3421 (fax)

nancy.goldenberg@usdoj.gov

Assigned: 10/21/24

TERMINATED: 12/20/24

LEAD ATTORNEY

Brian Weiss

5271 California Ste 270

Irvine, CA 92617

Added: 11/25/2024

(Financial Advisor)

PARTIES SERVED BY US MAIL

Top Twenty Unsecured Creditors

Amtrust Financial Services, Inc.
903 Nw 65th St. Ste 300
Boca Raton, FL 33487

First Insurance Funding Corporation
450 Skokie Blvd Ste 1000
Northbrook, IL 60062-7917

Premium Assignment Corporation dba IPFS
P.O. Box 412086
Kansas City, KA 64141-2086

Peerless Network
P.O. Box 76112
Cleveland, OH 44101-4755

The Goodyear Tire and Rubber Co.
P.O. Box 277808
Atlanta, GA 30384-7808

Burtronics Business Systems
P.O. Box 11529
San Bernardino, CA 92423

Mobile Mini - William Scotsman
PO Box 91975
Chicago, IL 60693-1975

Marlin Lease Servicing/Peac
P.O. Box 13604
Philadelphia, PA 19101-3604

Vestis
2680 Palumbo Dr
Lexington, KY 40509

Pape Machinery
P.O. Box 35144
Seattle, WA 98124-5144

The Toll Roads Violatins Department
Irvine, CA 92619

Oklahoma Turnpike Authority Plate-Pay
PO Box 11255
Oklahoma City, OK 73136

Fastrak Violation Processing Dept
PO Box 26925
San Francisco, CA 94126

Velocity Truck Center Los Angeles Truck Centers, LLC
Pasadena, CA 91189-1284

Grainger
Dept. 887538815
Palatine, IL 60038-0001

Linebarger Goggan Blair & Sampson
4828 Loop Central Drive Suite 600
Houston, TX 77081

Kansas Turnpike Authority
PO Box 802746
Kansas City, MO 64180

Florida Dept of Transportation
PO Box 31241
Tampa, FL 33631

City of Los Angeles Parking Violations Bureau
PO Box 30420
Los Angeles, CA 90030

North Texas Tollway Authority
PO Box 660244
Dallas, TX 75266

REQUEST FOR NOTICE

Brigid K. Ndege

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161 North Clark Street, Suite 4300

Chicago, Illinois 60601

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Kyle S. Hirsch

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